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*Attorney for Defendant The Commonwealth of the  
Northern Mariana Islands*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

**IMPERIAL PACIFIC INTERNATIONAL  
(CNMI), LLC**

**Plaintiff,**

**v.**

**COMMONWEALTH OF THE NORTHERN  
MARIANA ISLANDS, et. al.,**

**Defendants.**

**CIVIL CASE NO. 1:24-cv-00002**

**THE COMMONWEALTH OF THE  
NORTHERN MARIANA ISLANDS'  
MOTION TO DISMISS FIRST  
AMENDED COMPLAINT PURSUANT  
TO FEDERAL RULE OF CIVIL  
PROCEDURE 12(b)(1) and (6)**

**Hearing Date:  
Hearing Time:  
Judge: Hon. David O. Carter**

Defendant, The Commonwealth of the Northern Mariana Islands, by and through its counsel of record, Chief Solicitor, J. Robert Glass, Jr., moves this Court to dismiss Plaintiff's Complaint pursuant to Federal Rule of Civil Procedure 12(b)(1) and (6). This Motion is accompanied by a legal memorandum of points and authorities. *See* Local Rule 7.1(b).

1 Respectfully submitted: April 25, 2024

2 OFFICE OF THE ATTORNEY GENERAL  
3 EDWARD MANIBUSAN  
4 ATTORNEY GENERAL

5 /s/ J. Robert Glass, Jr.  
6 J. ROBERT GLASS, JR. (F0523)  
7 Chief Solicitor

8 **CERTIFICATE OF SERVICE**

9 I hereby certify that the above and foregoing was electronically filed on April 25, 2024, with  
10 service requested to all parties of record.

11 /s/ J. Robert Glass, Jr.  
12 J. ROBERT GLASS, JR. (F0523)  
13 Chief Solicitor  
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